

**In the UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**JEFF SCOTT as Special Administrator of
The estate of CHRISTIE SCOTT,**

Plaintiff,

vs.

**SANOFI-AVENTIS,
SANOFI-AVENTIS U.S. INC.,
SANOFI-SYNTHELABO,
SANOFI-SYNTHELABO, INC.,**

Defendants.

Case No. 08-CV-3549

**DEFENDANTS SANOFI AVENTIS U.S. INC. AND SANOFI SYNTHELABO INC.'S
MOTION FOR CONTINUANCE OF INITIAL STATUS HEARING**

Defendants sanofi aventis U.S. Inc. and Sanofi Synthelabo Inc. respectfully move this Court for a continuance of the Initial Status Hearing, currently set for July 22, 2008 at 9:00 a.m., to a date convenient for the Court in August 2008. In support of its Motion, defendants sanofi aventis U.S. Inc. and Sanofi Synthelabo Inc. state:

1. In this action, plaintiff Jeff Scott alleges the wrongful death of plaintiff's decedent, Christie Scott, following the alleged use of a prescription medication, Ambien®.

2. This case is one of several across the country involving Ambien®, and accordingly defendants sanofi aventis U.S. Inc. and Sanofi Synthelabo Inc. are counseled by a national coordinating counsel, Shook Hardy & Bacon LLP. For this action in this Court, defendants sanofi aventis U.S. Inc. and Sanofi Synthelabo Inc. are represented locally by Sidley Austin LLP.

3. Harvey L. Kaplan and Jon A. Strongman, both of Shook Hardy & Bacon LLP, have submitted applications for their appearance pro hac vice. Those applications are

appended collectively hereto as Exhibit A. In the event this case proceeds to trial, Mr. Kaplan and Mr. Strongman will participate as trial counsel pending the favorable disposition of their applications to appear pro hac vice in this matter. Mr. Kaplan and Mr. Strongman will also be active in the discovery process and the preparation of this case for trial.

4. This matter has been set for an Initial Status Hearing on July 22, 2008 at 9 a.m.

5. Counsel for defendants sanofi aventis U.S. Inc. and Sanofi Synthelabo Inc. is informed by the Court's Minute Entry setting an Initial Status Hearing for July 22, 2008 at 9 a.m. that the Court will expect that the parties report on the possibility of settlement and the extent of expected discovery. Counsel is also informed that the Court may wish to set control dates, including a trial date, governing this matter.

6. Because of engagements pre-dating the Court's Minute Entry setting this matter for an Initial Status Hearing, national coordinating counsel for defendants sanofi aventis U.S. Inc. and Sanofi Synthelabo Inc. will not be able to attend the Initial Status Hearing. Specifically, Mr. Kaplan will be out of the country from July 17, 2008 to July 29, 2008; Mr. Strongman will be in another state on July 22, 2008.

7. In view of the substantive nature of the Court's Initial Status Hearings, and the possibility that control dates set by the Court may limit national coordinating counsel's participation in the trial of this matter, defendants sanofi aventis U.S. Inc. and Sanofi Synthelabo Inc. respectfully request that the Court continue the Initial Status Hearing to a date convenient for the Court in August 2008, when national coordinating counsel are able to be present.

8. This is the first request for the continuance of a date set by the Court in this matter.

WHEREFORE, for the reasons stated, defendants sanofi aventis U.S. and Sanofi Synthelabo Inc. respectfully request that the Court continue the Initial Status Hearing, currently set for July 22, 2008, to a date convenient for the Court in August 2008.

SANOFI-AVENTIS U.S. INC.
SANOFI-SYNTHELABO INC.

By: s/ James R.M. Hemmings _____
One of Their Attorneys

Dated: July 14, 2008

Sara J. Gourley
James R.M. Hemmings
SIDLEY AUSTIN LLP
One South Dearborn Street
Chicago, Illinois 60603
(312) 853-7000
sgourley@sidley.com
jhemmings@sidley.com

CERTIFICATE OF SERVICE

I hereby certify that of the 14th day of July, 2008, I caused to be served a true and correct copy of the foregoing Motion by hand delivery on the following counsel of record:

Scott A. Kogen, Esq.
Law Offices of Scott A. Kogen & Associates, P.C.
134 N. LaSalle Street, Suite 1515
Chicago, Illinois 60602

Attorney for Plaintiff

s/ James R.M. Hemmings

James R.M. Hemmings

AMENDED

(Revised 02/01/01)

United States District Court Northern District of Illinois
AMENDED APPLICATION FOR LEAVE TO APPEAR PRO HAC VICE

Case Title:	JEFF SCOTT, as Special Administrator of The Estate of CHRISTIE SCOTT	Plaintiff(s)
	VS.	
	SANOFI-AVENTIS, SANOFI-AVENTIS U.S. INC., SANOFI-SYNTHELABO, SANOFI-SYNTHELABO, INC.	Defendant(s)
Case Number:	08-CV-3549	Judge: Suzanne B. Conlon

I, Harvey L. Kaplan hereby apply to the Court

under Local Rule 83.14 for permission to appear and participate in the above-entitled action on behalf of

defendants Sanofi-Aventis U.S. Inc. and by whom I have been retained.
Sanofi-Synthelabo, Inc.

I am a member in good standing and eligible to practice before the following courts:

Title of Court	Date Admitted
Missouri Supreme Court	08/31/68
U.S.D.C., W.D. of Missouri	09/13/68
U.S.D.C., E.D. Missouri	09/08/97
U.S.D.C., D. of Kansas (see attached sheet for additional courts)	04/15/98

I have currently, or within the year preceding the date of this application, made pro hac vice applications to this Court in the following actions:

Case Number	Case Title	Date of Application (Granted or Denied)*

*If denied, please explain:
(Attach additional form if
necessary)

Pursuant to Local Rule 83.15(a), applicants who do not have an office within the Northern District of Illinois must designate, at the time of filing their initial notice or pleading, a member of the bar of this Court having an office within this District upon who service of papers may be made.

Has the applicant designated local counsel? Yes ☒ No ☐

If you have not designated local counsel, Local Rule 83.15(b) provides that the designation must be made within thirty (30) days.

EXHIBIT

A

Has the applicant ever been:

censured, suspended, disbarred, or otherwise disciplined by any court?

Yes

☐

No

☒

or is the applicant currently the subject of an investigation of the applicant's professional conduct?

Yes

☐

No

☒

transferred to inactive status, voluntarily withdrawn, or resigned from the bar of any court?

Yes

☐

No

☒

denied admission to the bar of any court?

Yes

☐

No

☒

held in contempt of court?

Yes

☐

No

☒

NOTE: If the answer to any of the above questions is yes, please attach a brief description of the incident(s) and the applicant's current status before any court, or any agency thereof, where disciplinary sanctions were imposed, or where an investigation or investigations of the applicant's conduct may have been instituted.

I have read the Rules of Professional Conduct for the Northern District of Illinois, effective November 12, 1991 (Local Rules 83.50 through 83.58), and the Standards for Professional Conduct within the Seventh Federal Judicial Circuit, effective December 15, 1992, and will faithfully adhere to them. I declare under penalty of perjury that the foregoing is true and correct.

July 8, 2008

Date

Samuel L. Kaplan

Signature of Applicant

Applicant's Name	Last Name Kaplan	First Name Harvey	Middle Name/Initial L.
Applicant's Law Firm	Shook, Hardy & Bacon L.L.P.		
Applicant's Address	Street Address (include suite or room number) 2555 Grand Blvd.		State Bar Number MO 20459
	City Kansas City	State MO	ZIP Code 64108
	Work Phone Number 816-474-6550		

(The pro hac vice admission fee is \$100.00 for cases filed before February 1, 2001, and \$50.00 for cases filed on or after that date, and shall be paid to the Clerk. No admission under Rule 83.14 is effective until such time as the fee has been paid.)

(Fee Stamp)

NOTE: Attorneys seeking to appear pro hac vice may wish to consider filing a petition for admission to the general bar of this Court. The fee for admission to the General Bar is \$150.00. The fee for pro hac vice admission is \$100.00 for cases filed before February 1, 2001, and \$50.00 for cases filed on or after that date. Admission to the general bar permits an attorney to practice before this Court. Pro hac vice admission entitles an attorney to appear in a particular case only. Application for such admission must be made in each case; and the admission fee must be paid in each case.

ORDER

IT IS ORDERED that the applicant herein may appear in the above-entitled case.

DATED: _____

United States District Judge

HARVEY L. KAPLAN - Additional Courts Admitted	
United States Supreme Court	10/18/71
United States Court of Appeals for the Fifth Circuit	5/20/96
United States Court of Appeals for the Sixth Circuit	11/20/01
United States Court of Appeals for the Eighth Circuit	3/3/82
United States Court of Appeals for the Ninth Circuit	9/29/86
United States Court of Appeals for the Tenth Circuit	8/3/82
United States District Court for the District of Arizona	6/27/94
United States District Court for the District of Nebraska	9/12/01

AMENDED

(Revised 02/01/01)

United States District Court Northern District of Illinois**AMENDED APPLICATION FOR LEAVE TO APPEAR PRO HAC VICE**

Case Title:	JEFF SCOTT, as Special Administrator of The Estate of CHRISTIE SCOTT	Plaintiff(s)
	VS.	
	SANOFI-AVENTIS, SANOFI-AVENTIS U.S. INC., SANOFI-SYNTHELABO, SANOFI-SYNTHELABO, INC.	Defendant(s)
Case Number:	08-CV-3549	Judge: Suzanne B. Conlon

I, Jon A. Strongman hereby apply to the Court

under Local Rule 83.14 for permission to appear and participate in the above-entitled action on behalf of

defendants Sanofi-Aventis U.S. Inc. and Sanofi-Synthelabo, Inc. by whom I have been retained.

I am a member in good standing and eligible to practice before the following courts:

Title of Court	Date Admitted
Missouri Supreme Court	09/18/02
U.S.D.C., W.D. of Missouri	09/18/02
U.S.D.C., E.D. Missouri	04/24/03
U.S.D.C., D. of Kansas	12/18/03

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(Attach additional form if
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Yes

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No

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or is the applicant currently the subject of an investigation of the applicant's professional conduct?

Yes

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No

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transferred to inactive status, voluntarily withdrawn, or resigned from the bar of any court?

Yes

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No

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denied admission to the bar of any court?

Yes

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No

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held in contempt of court?

Yes

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No

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7/8/08

Date

s/ Jon A. Strongman

Signature of Applicant

Applicant's Name	Last Name Strongman		First Name Jon		Middle Name/Initial A.
Applicant's Law Firm	Shook, Hardy & Bacon L.L.P.				
Applicant's Address	Street Address (include suite or room number) 2555 Grand Blvd.				State Bar Number MO 53995
	City Kansas City	State MO	ZIP Code 64108	Work Phone Number 816-474-6550	

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DATED: _____

United States District Judge